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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

MAR 28 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of  
The Use of N11 Codes and Other  
Abbreviated Dialing Arrangements

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CC Docket No. 92-105

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AMERITECH'S PETITION FOR CLARIFICATION

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I. INTRODUCTION

Ameritech respectfully files this Petition seeking clarification that where a local exchange carrier ("LEC"), either incumbent or new, does not use 611 or 811 to provide access to its repair or business offices, it need not equip its switches to provide such access to resellers, and that adjunct to basic services are not limited to "local" services.

It appears that in the First Report and Order that the Commission only intended to create a duty to provide 611 or 811 access to resellers where the LEC uses the code. This is sound policy since where the LEC does not use the code, failure to make it available to resellers would not place them at a competitive disadvantage. Further, not mandating use of 611 and 811 to provide access to multiple providers is in the public interest

since any arrangement to provide a 611 or 811 presubscription or gateway to several providers would be expensive to implement, would degrade service, would lead to customer confusion and frustration, and would be expensive to implement and provide.

Ameritech also seeks clarification that in its First Report and Order, the Commission did not intend to redefine its category of services previously designated as “adjunct to basic” by limiting them to services, functions, or information that are “local” in nature. Since there exists no evidence on the record in this proceeding, or that of any other relevant proceeding, upon which the Commission could have intended to ground such a revision of its Computer Inquiry Rules, the requested clarification is appropriate. Further, such a limitation would hinder customer use of basic services in contravention of the Commission’s policies.

## **II. LECS SHOULD ONLY IMPLEMENT 611 OR 811 ACCESS FOR RESELLERS WHERE LECS USE THE CODE THEMSELVES.**

The Commission in its First Report and Order found that LECs could continue to use 611 and 811 to provide access to their repair and business office bureaus “until one or both of them is needed for other national purposes.”<sup>1</sup> However, the Commission found that use of these codes “by only one facilities-based carrier serving that market would be

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<sup>1</sup> First Report and Order ¶45.

anticompetitive.”<sup>2</sup> For that reason, the Commission determined that a facilities-based carrier “can use one or both of these codes even if it is already being used by another LEC.”<sup>3</sup> But, the Commission found that:

“all providers of telephone exchange service, both incumbent and new market entrants, whether facilities or non facilities-based providers of telephone exchange service, should be enabled to use 611 and 811 codes for repair and business office uses, as the incumbent LECs do now . . . by dialing these N11 numbers, customers should be able to reach their own carriers’ repair or business office services.”<sup>4</sup>

Ameritech supports the Commission’s finding that all LECs should have the option of programming their switches to route 611 and 811 calls to their repair and business office bureaus. Ameritech also agrees that if a LEC uses 611 or 811, it should offer the same option to resellers. However, Ameritech seeks clarification that the Commission intended that LECs are only required to provide access to a reseller’s repair or business office operations through 611 or 811 respectively, where the LEC itself uses the code. This clarification would provide LECs with the option of not using 611 or 811 in their switches, and thereby not incurring an obligation to set up 611 or 811 dialing for multiple providers. If the Commission did intend that 611 and 811 access be provided to resellers regardless of whether the

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<sup>2</sup> ID. ¶46.

<sup>3</sup> ID.

<sup>4</sup> ID.

LEC uses those codes then in the alternative, Ameritech asks the Commission to reconsider that decision.

Both the terms of the Commission's First Report and Order and its rationale support the conclusion that a LEC should only be required to provide 611 and 811 access to resellers where the LEC uses the code itself. In the First Report and Order, the Commission clarified that such access by resellers should be "as the incumbent LECs do now . . . ." <sup>5</sup> Thus, the reseller should only be able to demand access through 611 or 811 where the LEC whose service it is reselling uses the code.

Further, the Commission stated in the First Report and Order that the basis of its decision is that use of 611 and 811 by only LECs would be "anticompetitive". <sup>6</sup> The concern appears to be that a LEC will gain competitive advantage if it uses a dialing arrangement for access to its repair or business office functions that is not available to competitors. However, no competitive advantage arises where neither the LEC nor the reseller use 611 or 811.

Moreover, the Commission clarified in the First Report and Order that its decision is "consistent with the Act's requirement that all LECs

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<sup>5</sup> *ID.*

<sup>6</sup> *Supra.*, n .16.

permit competing providers of telephone exchange service and telephone toll service to have nondiscriminatory access to telephone numbers.”<sup>7</sup>

However, both LECs and resellers have the same nondiscriminatory access where neither uses 611 or 811.

Not only is a finding that LECs may elect not to use 611 or 811 to provide access to themselves and resellers consistent with the terms and rationale of the Commission’s First Report and Order, but more importantly, it is good public policy. Use of 611 and 811 to provide access to multiple providers from the same switch will lead to customer confusion, will degrade service and will inflate costs. For these reasons, Ameritech does not intend to use 611 or 811 in any exchange where it is providing local exchange service as an incumbent LEC. Ameritech does not currently use 811 in any state and only uses 611 in two states.<sup>8</sup> Because of the adverse service and operational impacts of using 611 as a gateway to itself and its resellers, Ameritech is in the process of discontinuing altogether its use of 611.

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<sup>7</sup> *ID.*

<sup>8</sup> Ameritech currently uses 611 only in Illinois and Wisconsin to provide access to its consumer repair bureaus. Because of concerns about customer confusion, Ameritech chose not to use 611 to provide repair access for both business and residence customers in those states.

Based upon a preliminary technical review, there appear to be two options for using 611 or 811 to provide access to multiple providers -- presubscription or some form of a gateway. Each is expensive to implement, would degrade service and would lead to customer confusion. On balance, neither option would therefore, provide good customer service or warrants the added cost of providing it.

Presubscription entails an arrangement where each local exchange service line provided by a LEC to a reseller is presubscribed to that reseller for purposes of 611 and 811 access. In that case, 611 or 811 calls dialed from the reseller's exchange line is routed to the reseller's repair or business office operations. Of course, 611 or 811 calls dialed by the LEC's own retail customers would continue to be routed to the LEC's repair or business office bureaus.

However, presubscription of 611 or 811 is not sensible from a customer service perspective because a high percentage of the calls to either 611 or 811 do not originate from the customer's own exchange line. For example, if a customer's home telephone service is out of service, the customer may call for repair from a neighbor's line. Imagine a customer's surprise and frustration if he or she is connected to the repair bureau of an incorrect carrier because the neighbor is served by a different provider.



Presubscription of 611 or 811 would also require expensive and time consuming switch software development, testing and deployment that could inflate the costs of providing repair.

Any gateway option is also expensive to implement and has flaws that will degrade service and lead to customer confusion. None of the options for providing a 611 or 811 gateway is user friendly because each would add an additional step, impose significant delays and confusion, and create a added point of possible failure in the system. For example, end users may need to listen to a long menu of providers and then only be connected to their provider after they make a selection.

Even if a database is used to route traffic to the correct provider, that arrangement would require the setting up of an expensive database, and would create another point of delay while a database look up is performed. Further, the database would be no better than the information in the database and inaccurate or obsolete data would result in the mis-direction of a customers' call, at a time when they are already being inconvenienced.

Equally as important, any gateway option will impose significant added costs. Additional trunking, software development, equipment, personnel and/or customer education will be required depending on the option selected. These costs could be very significant because of the new

equipment, facilities and software required to implement and provide them, and where applicable, because of the double handling involved.

### III. THE COMMISSION SHOULD NOT CHANGE THE DEFINITION OF "ADJUNCT TO BASIC" AND ENHANCED SERVICE.

#### A. History Of "Adjunct To Basic" Services

The history of the Commission's Computer Inquiry proceedings spans four decades.<sup>9</sup> Over that time, the Commission's approach to the distinction between computer and enhanced applications and telecommunications services has been significantly refined as technology, services and marketplaces blurred prior distinctions. Early attempts to draw a bright line between the technologies of "data processing" and "communications"<sup>10</sup> were abandoned, in recognition of the fact that:

"(f)rom the user's perspective, what is important is not whether a service is classified as communications or data processing, but that regulation not inhibit the user's ability to acquire needed communications services and facilities in an economic and reasonable fashion.... (S)uch a classification should not result in an artificial structure whereby less flexibility is afforded to tailor a service to individualized user needs."<sup>11</sup>

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<sup>9</sup> It was November 9, 1966 when the Commission initiated its original Computer Inquiry proceeding. In the Matter of Regulatory and Policy Problems Presented by the Interdependence of Computer and Communications Services and Facilities, Docket No. 16979, Notice of Inquiry, 7 F.C.C. 2d 11 (1966).

<sup>10</sup> (Cite to Computer Inquiry).

<sup>11</sup> In the Matter of Amendment of Section 64.702 of the Commission's Rules and Regulations (Second Computer Inquiry), Docket No. 20828, Tentative Decision and Further Notice of Inquiry and Rulemaking, 72 F.C.C. 2d 358 (1979)(hereinafter "CI-II Tentative Decision"), 393 (para. 66).

To that end, while the current construct embodied in the Commission's Computer Inquiry Orders does still distinguish between "basic" and "enhanced" services on the basis of their functionality, the Commission's policy allows sufficient flexibility to enable customers to reasonably obtain related services they need to efficiently utilize their basic telephone service.<sup>12</sup> Thus, consistent with the Commission's policy that regulation should not impair the ability of customers to obtain needed communications services, the present approach treats as basic services those offerings which might meet the literal definition of an enhanced service, but which are an integral part of, and permit the efficient use of, basic communication services (i.e., the "adjunct to basic" category).

In adopting this structure, the Commission noted that it did not intend to freeze its application of its definitions based upon current technology and service developments. In adopting this flexible approach the Commission stated:

"(t)here are significant public interest benefits inherent in this structure which accrue to carriers, consumers, and this Commission alike. With respect to carriers it provides a regulatory environment conducive to the rendering of new and innovative competitive services communications offerings by

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<sup>12</sup> The Commission's current Computer Inquiry Rules define enhanced services as those which "act on the format, content, code, protocol or similar aspects of the subscriber's transmitted information; provide the subscriber additional, different, or restructured information; or involve subscriber interaction with stored information." 47 CFR 64.702(a).

allowing resale carriers to take full advantage of computer technology and its market applications.”<sup>13</sup>

Creating the earliest version of the present three-level service structure (which classified services as either “basic”, “basic non-voice”, or “enhanced non-voice”, the Commission noted that:

“(w)e are not foreclosing enhanced processing applications from being performed in conjunction with ‘voice’ service. ... Computer processing applications such as call forwarding, speed calling, directory assistance, itemized billing, traffic management studies, voice encryption, etc., may be used in conjunction with ‘voice’ service.”<sup>14</sup>

To implement this policy, the Commission created the category of services now known as “adjunct to basic”.

The application of “adjunct to basic” category properly depends on the purpose of the service under consideration, and its relationship to the end user’s use of basic telephone service.<sup>15</sup> The very illustration of this analysis was, in fact, directory assistance, upon which the Commission remarked:

“The significance of purpose in identifying a ‘basic’ adjunct to basic service is perhaps most clear in the case of directory assistance. When a customer uses directory assistance, that customer accesses information stored in a telephone company

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<sup>13</sup> CI-II Tentative Decision, at 396 (para. 72).

<sup>14</sup> CI-II Tentative Decision, at 395 (n. 60).

<sup>15</sup> In the Matter of North American Telecommunications Association, Petition for Declaratory Ruling Under Part 64.702 of the Commission’s Rules Regarding the Integration of Centrex, Enhanced Services, and Customer Premises Equipment, Memorandum Opinion and Order, 101 F.C.C. 2d 349 (1985) (hereinafter “NATA Centrex Order”), 359 (para. 23).

database. Ordinarily, ... such a service would be considered enhanced. 'Dial-it', for example, was a service offered by AT&T which allowed information about news, stock prices, etc., to be stored within the network for retrieval by subscribers. ... The only significant difference between Dial-it and directory assistance is that the latter service provides only that information about another subscriber's telephone number which is necessary to allow use of the network to place a call to that other subscriber. An offering of access to a data base for the purpose of obtaining telephone numbers may be offered as an adjunct to basic service; an offering of access to a data base for most other purposes is the offering of an enhanced service."<sup>16</sup> (emphasis supplied)

Thus, the purpose of a particular service and its relationship to basic telephone service is the crux of the Commission's analysis. For example, the Commission explained in 1988 that:

"the intent was to recognize that while POTS [plain old telephone service] is a basic service, there are ancillary services directly related to its provision that do not raise questions about the fundamental ... nature of a given service."<sup>17</sup>

B. "Adjunct To Basic" Is Not Limited To "Local" Services.

A footnote in the First Report and Order in this proceeding appears to have mischaracterized the Commission's definition of adjunct to basic by stating:

"by 'traditional' directory assistance we refer to operator provision of local telephone numbers. The Commission has determined that traditional directory assistance services are "adjunct" to basic

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<sup>16</sup> NATA Centrex Order, at 360 (para. 26).

<sup>17</sup> In the Matter of North American Telecommunications Association, Petition for Declaratory Ruling Under Part 64.702 of the Commission's Rules Regarding the Integration of Centrex, Enhanced Services, and Customer Premises Equipment, Memorandum Opinion and Order, 3 FCC Rcd 4385 (1988) (hereinafter "NATA Centrex II"), 4389 (para. 30).

services and are regulated pursuant to Title II of the Communications Act.”<sup>18</sup>

The unfortunate language of this footnote is the reason for this request for clarification.

As explained in Section A above, the classification of individual services -- and in particular, directory assistance services -- as “adjunct to basic” has always been based upon the purpose served by the service, and not the geographic scope of the service or data involved. For example, contrasting speed dialing, call forwarding and directory assistance services with enhanced services, the Commission explained that:

“(t)he purpose served by each of these services, and the relationship of each to basic telephone service, distinguishes these adjunct services from technologically similar enhanced services.”<sup>19</sup>

Similarly, the Commission has noted that:

“the enhanced service definition does not encompass ‘adjunct[s] to basic service’ which facilitate the provision of basic services without altering their fundamental character.”<sup>20</sup>

and, more recently, that:

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<sup>18</sup> In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, First Report and Order And Further Notice of Proposed Rulemaking, rel. February 19, 1997 (hereinafter “N11 Order”), at 29 (fn. 170).

<sup>19</sup> NATA Centrex Order, at 360 (para. 25).

<sup>20</sup> NATA Centrex II, at 4386 (para. 8).

“(s)ervices (based upon Calling Party Number, such as calling name and call return,) may be offered as common carrier services if they facilitate the customer’s use of the basic transmission channel.”<sup>21</sup>

This long-established policy of basing the categorization of a service on the nature and purpose of the particular service is key to the instant inquiry. For purposes of determining the nature of a particular service as basic, enhanced, or adjunct to basic, not one of the Commission’s prior Orders or its Rules has in any way limited adjunct to basic service to just “local” versus long distance services, or more particularly, directory assistance to just “local” numbers of the LEC. Thus, there is no evidence or indication that the classification of a particular service as basic, adjunct to basic, or enhanced can or should be tied to its “local” character -- whatever the intended meaning of that term.<sup>22</sup>

The reason for the absence of a “local” requirement from the Commission’s long-established basic/enhanced construct as applied to directory assistance is simple. Regardless of whether the number is used to

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<sup>21</sup> In the Matter of Rules and Policies Regarding Calling Number Identification Service -- Caller ID, Memorandum Opinion And Order on Reconsideration , Second Report and Order and Third Notice of Proposed Rulemaking, 10 FCC Rcd 11700 (1995), 11747 (fn. 188).

<sup>22</sup> The previous record is of no help in resolving the intended meaning of the vague term “local” in the footnote at issue. This term cannot mean local versus long distance since the services categorized as adjunct to basic have for many years included long distance functions and data. Moreover, it cannot reasonably be said to mean “intraLATA”, as the relevant Computer Inquiry record itself straddles the event of the Bell system’s divestiture, which spawned the term “LATA”. See U.S. v. Western Electric Company, Inc., 569 F. Supp. 990 (1983), at 993-5 (fn. 4,9).

place a local or toll call, the result is the same -- the number is used to place a call.

Classifying a particular service based upon its "local" nature would also lead to other absurd results. For example, BOCs offering speed dialing as adjunct to basic could no longer permit end-user customers to store telephone numbers outside of an end-user's local calling area. Similarly, call forwarding service could be classified as either enhanced or adjunct to basic, depending upon whether the "forward-to" numbers entered by a particular end-user customer were within the end users local calling area. The regulatory treatment of calling party name and other caller ID-based services would change based upon whether the telephone number of the calling party was "local" to that of end-user subscriber.

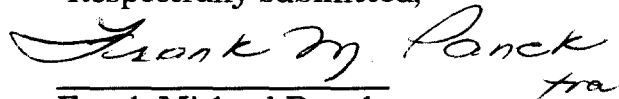
Clearly, the Commission did not intend to undermine its policies favoring convenient use of basic services by suddenly limiting the "adjunct to basic" category to services that meet some artificial "local" characteristic.



IV. CONCLUSION.

The Commission should clarify that where a LEC does not itself use 611 or 811 to provide access to its repair or business office bureaus, it is not required to provide such access to the repair and business office operations of resellers. The Commission should also issue an Order striking footnote 170 from its First Report and Order, and clarifying that its previous analysis of adjunct to basic services and their treatment under the enhanced services rules remains unchanged.

Respectfully submitted,

A handwritten signature in cursive script that reads "Frank M. Panek". To the right of the signature, the letters "tra" are written in a smaller, less distinct cursive script.

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**CERTIFICATE OF SERVICE**

I, Edith Smith, do hereby certify that copies of Ameritech's Petition for Clarification has been served on the parties listed below, by first class mail, postage prepaid, on this 28th day of March, 1997.

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